

Presented to the Court by the foreman of the
Grand Jury in open Court, in the presence of
the Grand Jury and FILED in the U.S.
DISTRICT COURT at Seattle, Washington.

August 1 20 19
WILLIAM M. McCOOL, Clerk
By Wm. M. McCool Deputy

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

UNITED STATES OF AMERICA,
Plaintiff

N C R 1 9 - 1 4 6 JCC

INDICTMENT

MARIE CHRISTINE FANYO-PATCHOU,
RODRIGUE FODJO KAMDEN, and,
CHRISTIAN FREDY DJOKO,

Defendants.

The Grand Jury alleges that:

General Allegations

At all times material to this Indictment:

1. Defendants MARIE CHRISTINE FANYO-PATCHOU, RODRIGUE FODJO KAMDÉN, and CHRISTIAN FREDY DJOKO were from Cameroon, a country in West Africa. John Doe was also from Cameroon. The defendants and John Doe lived in the United States during the years 2017 and 2018.

2. According to the U.S. Department of State's Cameroon 2018 Human Rights Report, in Cameroon, consensual same-sex sexual activity is illegal and punishable by imprisonment for a term lasting between six months and five years. The Report further describes that members of the Lesbian, Bisexual, Gay, Transgender, and

1 Queer community in Cameroon are routinely targeted for violence and threats of violence
2 because of their real or perceived sexual orientation or gender identity.

3. John Doe is gay. He relocated to the United States in or around 2014.

4 While in the United States, John Doe met his husband and they married in approximately
5 2016.

COUNT 1

(Conspiracy to Engage in Cyberstalking)

8 4. The allegations contained in Paragraphs 1 through 3 of this Indictment are
9 re-alleged and incorporated into Count 1 as if set forth fully herein.

10 5. Beginning at a time unknown and within the last five years, and continuing
11 through on or about November 3, 2018, in King and Snohomish Counties, within the
12 Western District of Washington, and elsewhere, MARIE CHRISTINE FANYO-
13 PATCHOU, RODRIGUE FODJO KAMDEN, CHRISTIAN FREDY DJOKO, and others
14 known and unknown to the Grand Jury, conspired and agreed together to, with the intent
15 to harass and intimidate John Doe, use an interactive computer service, an electronic
16 communications service, an electronic communication system of interstate commerce,
17 and other facilities of interstate and foreign commerce, to wit: text messages, online
18 postings, and social media messaging and posting, including WhatsApp and Facebook, to
19 engage in a course of conduct that:

a. Placed John Doe in reasonable fear of serious bodily injury to John Doe and John Doe's immediately family members, and,

b. Caused, attempted to cause, and would be reasonably expected to cause substantial emotional distress to John Doe and John Doe's immediate family members,

25 in violation of Title 18, United States Code, Sections 2261A(2)(A) and (2)(B).

MANNER AND MEANS OF THE CONSPIRACY

27 6. MARIE CHRISTINE FANYO-PATCHOU, RODRIGUE FODJO
28 KAMDEN, CHRISTIAN FREDY DJOKO, and other co-conspirators, carried out the

1 conspiracy through the use of a variety of electronic communication applications,
2 including Facebook and WhatsApp, through which they harassed and intimidated John
3 Doe by distributing and disseminating personal and intimate materials relating to John
4 Doe's sexual orientation to other members of the Cameroonian communities in the
5 United States and Cameroon, and made threatening statements designed to place John
6 Doe and his family members in fear of serious bodily injury.

7 OVERT ACTS

8 During and in furtherance of the conspiracy, within the Western District of
9 Washington and elsewhere, one or more of the following overt acts, among others, were
10 committed:

11 7. During September 2018, FANYO-PATCHOU moved out of John Doe's
12 residence and took with her a cell phone that contained copies of John Doe's personal
13 photographs that documented his marriage and relationship to a man. Some of the
14 photographs on the cell phone of John Doe were intimate in nature and contained nudity.

15 8. On or about October 4, 2018, in a WhatsApp messaging exchange,
16 KAMDEN asked FANYO-PATCHOU to send him all the materials that she had
17 pertaining to John Doe.

18 9. Between on or about October 16, 2018, and October 18, 2018, FANYO-
19 PATCHOU used WhatsApp to send photographs and materials about John Doe and his
20 husband to KAMDEN. These photographs and materials included a copy of John Doe's
21 marriage certificate, a photograph of John Doe kissing his husband, a photograph of John
22 Doe and his husband in a hotel room, and a nude photograph of John Doe.

23 10. Between on or about October 16, 2018, and November 3, 2018,
24 KAMDEN uploaded the same photographs sent to him by FANYO-PATCHOU in at
25 least one publicly available post over Facebook. KAMDEN further disseminated the
26 photographs to other persons in the Cameroonian community, using text message and
27 various social media platforms, including WhatsApp and Facebook.

28 11. For example, on or about October 17, 2018, KAMDEN, using WhatsApp,

1 communicated with “Chao” and sent several photographs of John Doe with his husband.
2 These included photographs of John Doe and his husband kissing, the biographic page of
3 John Doe’s passport, and John Doe’s Facebook Messenger contact profile. KAMDEN
4 had previously obtained the biographic page of John Doe’s passport from DJOKO, who
5 previously sent it to KAMDEN using WhatsApp on or about September 28, 2018.

6 12. On or about October 21, 2018, as part of the defendants’ course of conduct
7 to place John Doe in fear of serious bodily injury, KAMDEN and DJOKO physically
8 assaulted John Doe. During the assault, KAMDEN and DJOKO, in French, called John
9 Doe a “faggot,” stated, “she tried to make you change but you didn’t want to,” (referring
10 to FANYO-PATCHOU), and made other derogatory comments about John Doe’s sexual
11 orientation.

12 13. On or about October 25, 2018, FANYO-PATCHOU, using Facebook,
13 publicly posted this statement referring to John Doe: “The faggot of Seattle needs to kill
14 himself after writing his will.”

15 14. In October 2018, John Doe received a WhatsApp message from an
16 unknown co-conspirator using a phone number with a Cameroonian country code. The
17 message stated, “[John Doe] will you really never change? Fanyo told us she did
18 everything in the world to change you to make you hetero. You’re still remaining a
19 faggot? Here’s your faggot direct from Fanyo.” The message included a photograph of
20 John Doe with his husband. This was one of the photographs on the cell phone taken by
21 FANYO-PATCHOU that she had also sent to KAMDEN using WhatsApp.

22 15. In October 2018, John Doe received a message on WhatsApp from another
23 unknown co-conspirator with a phone number with a Cameroonian country code. The
24 message stated: “[John Doe] we have your skin. Did you think you could run away from
25 Cameroon to bake? You can’t escape, Fanyo is in the United States and we will do
26 everything to destroy your marriage. You saw what we did to your mom’s house? It’s
27 just the beginning. A faggot family from the father to the children. We have your

1 address. We'll finish you." At that time, John Doe was aware of a recent incident
2 involving the vandalism of his mother's home in Cameroon.

3 16. In and around early November 2018, KAMDEN published information on
4 Facebook stating that John Doe is gay and falsely stating that John Doe was
5 "prostituting" himself in the United States to make money.

6 17. On or about November 1, 2018, DJOKO, using WhatsApp, sent to
7 KAMDEN a photograph of an array of printed copies of photographs of FANYO-
8 PATCHOU with John Doe, along with a printed copy of John Doe's marriage certificate.
9 DJOKO and KAMDEN then discussed when to publish this material, and KAMDEN
10 confirmed, "I posted."

11 18. On or about November 1, 2018, KAMDEN, using WhatsApp, sent a text
12 message to DJOKO stating, "I will send you you can publish," along with a digital copy
13 of a photograph of John Doe and his husband in a motel room in their pajamas. DJOKO
14 responded "[I]t's already done on face," referring to having posted the photo on
15 Facebook.

16 19. On or about October 31, 2018, KAMDEN, using WhatsApp, sent a
17 message to John Doe's stepmother who resides in Cameroon. The message was a screen
18 shot of a photograph gallery that contained images of John Doe with his husband and a
19 nude photograph of John Doe.

20 20. On or about November 2, 2018, KAMDEN, using WhatsApp, sent another
21 message to John Doe's stepmother. This message was a screenshot of KAMDEN's
22 Facebook page that contained a post stating John Doe "was a homosexual," and falsely
23 stating "that he prostituted himself for money," and that he was physically abusive
24 toward FANYO-PATCHOU, after which she became "infected with a STD."

25 21. Also on November 2, 2018, KAMDEN, using WhatsApp, sent to John
26 Doe's father photographs of John Doe, including intimate photographs of John Doe and
27 his husband.

28 All in violation of Title 18, United States Code, Section 371.

COUNT 2

(Interstate Stalking)

22. The allegations contained in Paragraphs 1-3, and 7-21 of this Indictment are re-alleged and incorporated into Count 2 as if set forth fully herein.

5 23. Beginning in or about September 2018, and continuing through on or
6 November 3, 2018, in King and Snohomish Counties, within the Western District of
7 Washington, and elsewhere, MARIE CHRISTINE FANYO-PATCHOU, RODRIGUE
8 FODJO KAMDEN, and CHRISTIAN FREDY DJOKO, with the intent to harass and
9 intimidate John Doe, used, and aided and abetted the use of, an interactive computer
10 service, an electronic communication service, and electronic communication system of
11 interstate commerce, and other facilities of interstate and foreign commerce, to wit: text
12 messages, online postings, and social media messaging and posting, including WhatsApp
13 and Facebook, to engage in a course of conduct that:

a. Placed John Doe in reasonable fear of serious bodily injury to John Doe and John Doe's immediately family members, and,

b. Caused, attempted to cause, and would be reasonably expected to cause substantial emotional distress to John Doe and John Doe's immediate family members.

24. The Grand Jury alleges that this offense was committed during and in furtherance of the conspiracy charged in Count 1 above.

1 All in violation of Title 18, United States Code, Sections 2 and 2261A(2)(A)
2 and (2)(B).

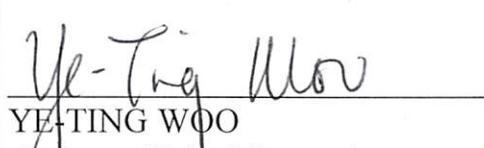
3 A TRUE BILL.

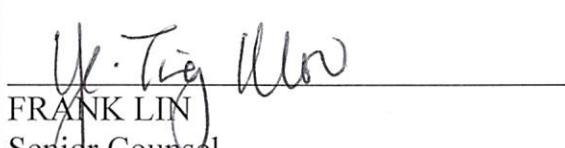
4 DATED: *August 1, 2019*

5 *Signature of the foreperson is redacted*
6 *pursuant to the policy of the Judicial*
7 *Conference of the United States*
8 FOREPERSON

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